

CPK  
F.# 2025R00200

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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6:25cr666-KFM

**TO BE FILED UNDER SEAL**

UNITED STATES OF AMERICA

**COMPLAINT**

- against -

Case No. 25-MJ-164 (SIL)

TONY REAM,  
Defendant.

(18 U.S.C. § 1343)

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EASTERN DISTRICT OF NEW YORK, SS:

JENNIFER RIKER, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between, October 2020 and November 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TONY REAM, did knowingly and intentionally devise a scheme and artifice to defraud Corporation #1, which is an entity whose identity is known to the United States Attorney by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1343)

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for approximately thirteen years. While employed as an FBI Special Agent, I have directed, conducted and participated in numerous investigations of federal criminal violations, including investigations concerning mail fraud, wire fraud, conspiracy to commit mail and wire fraud, securities fraud, bank fraud and money laundering, amongst others. Currently, I am assigned to an FBI squad that handles white-collar criminal matters, such as those listed above. I am familiar with the facts and circumstances set forth below based on my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The FBI has been investigating a fraudulent scheme in which the Credit Supervisor of Corporation #1, which is located in the Eastern District of New York, has been embezzling, siphoning and stealing monies from Corporation #1.

3. At Corporation #1, a customer credit is established when a customer is due a refund based on overpayment, mischarges or returned product. A customer credit is usually refunded to the customer or applied to an existing or future balance.

4. At Corporation #1, TONY REAM has authority to initiate and/or approve credit disbursements from customers' accounts.

5. The investigation was prompted, in part, by complaints from Corporation #1 that, between October 2020 and November 2024, TONY REAM had diverted customer


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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

credits of approximately one million and six hundred thousand dollars (\$1,600,000) to his personal debit card at PNC Bank. Investigation has disclosed that REAM used these funds for his personal expenses.

6. Further investigation has disclosed that, since October 2020, TONY REAM, using his supervisory authority at Corporation #1, has transferred, without authorization, approximately \$1.6 million dollars from customer credit balances to his personal debit card. The transfer of these funds was done using, among other things, interstate wires. In addition, there were interstate emails used in connection with this scheme. These transfers were unauthorized and without approval of Corporation #1.

WHEREFORE, your deponent respectfully requests that the defendant TONY REAM, be dealt with according to law.

  
JENNIFER RIKER  
Special Agent, Federal Bureau of Investigation

Sworn to before me this  
7th day of May, 2025



THE HONORABLE STEVEN I. LOCKE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK